

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**BILL OF INFORMATION FOR THEFT
CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
ELIAS CASTELLANOS	*	VIOLATION: 18 U.S.C. § 666 (a)(1)(A)
	*	
*	*	*

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. The Housing Authority of New Orleans ("HANO"), which was created by the State of Louisiana, was a local political subdivision of the State of Louisiana that received federal assistance in excess of \$10,000 annually.
2. Defendant, **ELIAS CASTELLANOS**, was an agent of HANO from in or near September, 2006, continuing to in or near June, 2009 and acted as the Chief Financial Officer ("CFO") for HANO from in or about September, 2006, to in or near January, 2009.

B. THE OFFENSE:

From in or near September, 2006, continuing to in or near June, 2009, in the Eastern District of Louisiana, and elsewhere, the defendant, **ELIAS CASTELLANOS**, acting as an authorized representative and agent of HANO did knowingly and wilfully embezzle, steal, obtain by fraud and otherwise unlawfully convert to the use of **ELIAS CASTELLANOS**, property valued at approximately \$900,927.00, which was owned by and under the care, custody and control of HANO.

All in violation of Title 18, United States Code, Section 666 (a)(1)(A)(i)(ii).

NOTICE OF FORFEITURE

1. The allegations of Count 1 of this bill of information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 666(a)(1) and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offense alleged in Count 1, defendant, **ELIAS CASTELLANOS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 666(a)(1)(A)(i)(ii), including but not limited to:

a. \$876,917.00 in United States Currency and all interest and proceeds traceable thereto.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

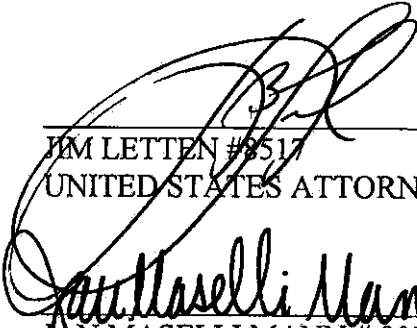
a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;


- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant(s) up to the value of the above forfeitable property.

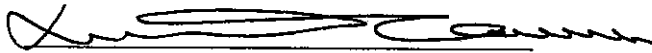
All in violation of Title 18, United States Code, Sections 666 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.



JIM LETTEN #8517
UNITED STATES ATTORNEY



JAN MASELLI MANN # 9020
First Assistant United States Attorney



MATTHEW M. COMAN #23613
Assistant United States Attorney

New Orleans, Louisiana
August 31, 2009